



February 10, 2015
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

**RE: International Communication Services, Inc.
EB Docket No. 06-36; CY2014**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of International Communication Services, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to stthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant to International Communication Services, Inc. d/b/a Directo.com

cc: Esther Figueroa - Intl Comm Svcs
file: Intl Comm Svcs - FCC - Other
tms: FCx1501

Enclosures
ST/im

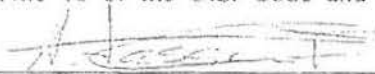
ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for: Calendar Year 2014
Name of Company covered by this certification: International Communications Services, Inc.
Form 499 Filer ID: 826847
Name of Signatory: Angharad Jassan
Title of Signatory: Treasurer

I, Angharad Jassan, certify and state that:

1. I am Treasurer of International Communications Services, Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules See 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Attachment A, is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.


Angharad Jassan, Treasurer
International Communication Services, Inc.

02/06/2015
Date

Attachments: Accompanying Statement explaining CPNI procedures - Attachment A.

ATTACHMENT A

Statement of CPNI Procedures and Compliance

International Communications Services, Inc.

Calendar Year 2014

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

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International Communications Services, Inc.

Statement of CPNI Procedures and Compliance

International Communications Services, Inc. ("ICS" or "Company") operates solely as a provider of long distance prepaid debit card services sold via the internet or in retail stores not owned or operated by the Company. For retail services, the Company does not have any subscribed relationship with its customers and does not have any identifying information regarding its customers. Web-based sales do provide the Company an opportunity to build a subscribed relation with its customers.

ICS does not use or permit access to CPNI for marketing purposes. ICS' marketing efforts are mass advertising, including internet advertising, and point of sale, and do not include the use of CPNI. Should ICS expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company however does maintain prepaid debit call detail records. The Company ensures that all access to call detail information is safeguarded from improper use or disclosure by employees and has in place methods to discover and protect against attempts by third parties to gain unauthorized access to this information. Call detail is not available and therefore is not disclosed at retail locations. Because the Company does not have any information regarding customers who purchase retail cards, the only authentication method available to the Company is to require that the customer provide the 10 digit PIN on the back of the card when calling for customer service.

Customers who purchase prepaid service via the internet are requested to establish a password on-line. Account information, including call detail, is available to customers of on-line service. In the event a customer loses or forgets the password established, the company has authentication procedures to allow the customer to set up a new password. Information is only provided to customers via the email address established when service was initiated.

Call detail information is only provided to government agencies or law enforcement, in writing, as a result of a subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and should such an event occur, will record all breaches discovered and notifications made to the United States Secret Service and the FBI. Attempts will be made to the extent the Company has such information, to customers.

ICS has not taken any actions against data brokers in the last year

ICS did not receive any customer complaints about the unauthorized release of CPNI in calendar year 2014.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.